

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVES FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION, REDIRECTED FROM POSTAL SERVICE  
WITNESS RACHEL (PR/USPS-T8-1-3)**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories and requests of the Public Representative dated December 21, 2011, redirected from witness Rachel (USPS-T-8). Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE INTERROGATORIES,  
REDIRECTED FROM WITNESS RACHEL**

**PR/USPS-T8-1**

Please provide the total current number of Full Time Equivalent (FTE) employees and an estimate of the number of non-managerial FTEs that would need to be eliminated in order to implement the proposal in this docket by the following categories.

- a. FTE Clerks.
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated
- b. FTE Mail Handlers
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated
- c. FTE Motor Vehicle Operators
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated
- d. FTE Maintenance Personnel
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated

**RESPONSE:**

FTE represents the full time equivalent of all work-hours in an employee category divided by the average number of hours worked by a full time employee in a year.

Current Total FTEs provided below reflect an average for FY11. This is based on the CRA development of labor costs, as provided in Docket No ACR 2011, USPS-FY11-7.

In response to each part ii, below, we have provided the amount of FTEs consistent with the savings put forth in the testimonies of witnesses Smith, USPS-T-9, and Bradley, USPS-T-10. As such, FTEs in this context do not equate to the number of staff to be "eliminated". It is the FTE reductions consistent with the savings.

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- a.    i   155,627.0
- ii   9,184.1
- b.    i       50,419.2
- ii       6,132.0
- c.    i       7,808.7
- ii       1,387.2
- d.    i       40,616.2
- ii       6,542.6

**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**PR/USPS-T8-2**

Please provide the number of non-managerial employees that do not have layoff protection in the following categories.

- a. FTE Clerks.
- b. FTE Mail Handlers
- c. FTE Motor Vehicle Operators
- d. FTE Maintenance Personnel

**RESPONSE:**

Please see the explanation for proper use of the descriptor “FTE” or “FTEs” in the response to PR/USPS-T8-1. The number of actual employees that do not have layoff protection in the following categories are as follows:

- a. Clerks: 385
- b. Mail Handlers: 2515
- c. Motor Vehicle Operators: 0
- d. Maintenance Personnel: 0

**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**PR/USPS-T8-3**

Please refer to your testimony at page 13, which mentions several avenues through which existing Postal Service employees may exit the Postal Service, including Very Early Retirement (actually Voluntary Early Retirement), Attrition, and Layoffs. Please provide a breakdown, of all bargaining and non-bargaining Clerks, Mail Handlers, Motor Vehicle Operators, and Maintenance Personnel, for Fiscal Years 2005 through 2010, who:

- a. Took early retirement,
- b. Took optional retirement,
- c. Were laid off,
- d. Separated from the Postal Service for any other reason, or
- e. Were new FTE hires.

**RESPONSE:**

Listed in the chart on the following page are the number of actual employees Clerks, Mail Handlers, Motor Vehicle Operators, and Maintenance employees leaving or entering Postal Service employment during FY2005-FY2010.

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**PR/USPS-T8-3**

**FY's**

<b>Request</b>	<b>Craft</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>TOTAL</b>
(A) EARLY RETIREMENT	CLERK	591	303	29	58	4,669	3,565	9,215
	MAIL HANDLER	1	4	2	1	623	503	1,134
	MV OPERATOR	20	4	0	0	43	35	102
	MAINTENANCE	159	15	0	1	380	388	943
<b>(A) EARLY RETIREMENT Total</b>		<b>771</b>	<b>326</b>	<b>31</b>	<b>60</b>	<b>5,715</b>	<b>4,491</b>	<b>11,394</b>
(B) OPTIONAL RETIREMENT	CLERK	5,379	5,355	5,644	5,595	6,138	11,819	39,930
	MAIL HANDLER	1,077	1,065	1,077	1,212	1,250	2,378	8,059
	MV OPERATOR	218	178	218	185	210	396	1,405
	MAINTENANCE	1,083	1,070	1,149	1,164	1,092	2,087	7,645
<b>(B) OPTIONAL RETIREMENT Total</b>		<b>7,757</b>	<b>7,668</b>	<b>8,088</b>	<b>8,156</b>	<b>8,690</b>	<b>16,680</b>	<b>57,039</b>
(C) LAID OFF	CLERK	0	0	0	0	0	0	0
	MAIL HANDLER	0	0	0	0	0	0	0
	MV OPERATOR	0	0	0	0	0	0	0
	MAINTENANCE	0	0	0	0	0	0	0
<b>(C) LAID OFF Total</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
(D) ALL OTHER SEPARATIONS	CLERK	6,343	5,726	5,077	4,279	3,270	3,181	27,876
	MAIL HANDLER	1,727	1,646	1,788	1,695	1,237	1,295	9,388
	MV OPERATOR	302	279	256	270	134	134	1,375
	MAINTENANCE	860	794	788	734	567	538	4,281
<b>(D) ALL OTHER SEPARATIONS Total</b>		<b>9,232</b>	<b>8,445</b>	<b>7,909</b>	<b>6,978</b>	<b>5,208</b>	<b>5,148</b>	<b>42,920</b>
(E) CAREER APPOINTMENTS	CLERK	9,539	6,449	3,388	2,174	13	15	21,578
	MAIL HANDLER	3,701	2,589	2,827	1,355	3	1	10,476
	MV OPERATOR	844	780	677	545	37	2	2,885
	MAINTENANCE	911	1,142	1,007	931	183	3	4,177
<b>(E) CAREER APPOINTMENTS Total</b>		<b>14,995</b>	<b>10,960</b>	<b>7,899</b>	<b>5,005</b>	<b>236</b>	<b>21</b>	<b>39,116</b>

Data Source: EDW/HRBI (12/22/2011)

**Note:**

Early Retirement = NOA 303

Optional Retirement = NOA 302

All Other Separations = NOAs 301, 310, 311, 313, 317, 320, 324, 325, 326, 328, 329, 346, 350, 356

Career Appointments = NOAs 100, 101, 130, 140, 160, 161, 500, 501

Does not include HQ/APWU - IT/ASC, Operating Services or Matieral Support employee categories